

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JASON B. HAMILTON	:	
CHRISTINE MARIE HAMILTON	:	CASE NO. 1:19-bk-03853
Debtors	:	
	:	
	:	
Nationstar Mortgage LLC d/b/a Mr. Cooper	:	
Movant.	:	
v.	:	
	:	
Jason B. Hamilton and Christine Marie Hamilton	:	
Debtors/Respondents,	:	
Jack N. Zaharopoulos, Trustee	:	
Additional Respondent.	:	

STIPULATION RESOLVING OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER TO DEBTORS' MOTION TO SELL REAL ESTATE

Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its counsel, LOGS Legal Group LLP, the Chapter 13 Trustee, and Dorothy L. Mott, attorney for the Debtors hereby stipulate in resolution of the Movant's Objection to Sale as follows:

1. Nationstar Mortgage LLC d/b/a Mr. Cooper has no objection to the Debtors' Motion to Sell Real Estate to the extent their lien is paid in full subject to a proper payoff. As of April 11, 2022 the approximate to payoff Nationstar Mortgage LLC d/b/a Mr. Cooper's lien thru May 9, 2022 is \$191,524.96. Nationstar Mortgage LLC d/b/a Mr. Cooper will not accept a short sale without their approval, and that a payoff must be requested prior to closing.
2. The order approving the sale shall include the provisions of the preceding paragraph.

/s/ Kristen D. Little

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Debtors :
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Nationstar Mortgage LLC d/b/a Mr. :
Cooper :
Movant. :
v. :
:
Jason B. Hamilton and Christine Marie :
Hamilton :
Debtors/Respondents, :
Jack N. Zaharopoulos, Trustee :
Additional Respondent.

ORDER

Upon consideration of Debtors' Motion to Sell Real Estate, and it appearing that no Objection or Answer was filed to the Motion by the time set forth in an Order,
good reason appearing therefore, no objections appearing thereto,

IT IS HEREBY ORDERED AND DECREED that Federal Bankruptcy Rule 6004(g) is not applicable, and the real property may be sold and purchased immediately upon entry of Order of Court approving same and that the sale of real estate at 15 Dicken Drive, Marysville, PA, to Jillian C. Fairell for \$259,900.00 is approved and distribution of the proceeds as set forth below shall be permitted:

1. Payment of all closing costs for which Debtors are liable.
2. Payment of attorney's fees in the amount of \$3,500.00 to Mott & Gendron Law.
3. Payment of any and all other miscellaneous fees involved with the sale.
4. Payment in full of the first mortgage, subject to mortgagee's pay off; and payment in full of any other valid liens and mortgages.
5. Payment in full of Perry County Tax Claim Bureau real estate taxes, if any.
6. The net proceeds, after deduction for payments made pursuant to paragraphs 1 through 5 above, shall be divided evenly between Debtor and Co-Owner.
7. If there are net proceeds remaining due and owing to Debtors after paying all of the costs, fees and liens set forth in the preceding paragraphs, then payment of any and all attorney fees owed to Debtors' counsel for representation in the above matter and which have been previously approved by the Court.
8. If there are net proceeds remaining due and owing to Debtors after paying all the costs,

fees and liens, set forth in the preceding paragraphs, then the remaining balance, if any, shall be distributed to the Debtors, up to the amount of their exemptions in said property, i.e. \$50,300.00 pursuant to 11 U.S.C. §522(d)(1) and (d)(5)..

9. Any remaining net proceeds due to the Debtors, after paying all the costs, fees, and liens, set forth in the preceding paragraphs, shall be paid to the Chapter 13 Bankruptcy Trustee, to be applied to the amount due pursuant to Debtors' Plan.

10. Nationstar Mortgage, LLC d/b/a Mr. Cooper shall be paid in full subject to a proper payoff. As of April 11, 2022 the approximate to payoff Nationstar Mortgage LLC d/b/a Mr. Cooper's lien thru May 9, 2022 is \$191,524.96. Nationstar Mortgage LLC d/b/a Mr. Cooper will not accept a short sale without their approval, and that a payoff must be requested prior to closing.